UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK - MANHATTAN DIVISION

In Re: Case No. 12-12020-MG

RESIDENTIAL CAPITAL, LLC AKA RESIDENTIAL CAPITAL CORPORATION,

Chapter 11

Debtor(s).

REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, submits this Request for Notice and Service of Copies as agent for Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 and not as counsel of record.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Jenelle C. Arnold ALDRIDGE PITE, LLP 4375 Jutland Drive, Suite 200 P.O. Box 17933 San Diego, CA 92177-0933 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize ALDRIDGE PITE, LLP, either expressly or impliedly through ALDRIDGE PITE, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;
- c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: October 3, 2017 ALDRIDGE PITE, LLP

/s/ Jenelle C. Arnold Jenelle C. Arnold ALDRIDGE PITE, LLP 4375 Jutland Dr., Suite 200 P.O. Box 17933 San Diego, CA 92117-0933 ALDRIDGE PITE, LLP 4375 Jutland Drive, Suite 200 P.O. Box 17933 San Diego, CA 92177-0933 Telephone: (858) 750-7600 Facsimile: (619) 590-1385

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK - MANHATTAN DIVISION

In re Case No. 12-12020-mg
RESIDENTIAL CAPITAL, LLC, Chapter 11
Debtor(s). PROOF OF SERVICE

I, Michael L. Tidwell, declare that:

I am employed by Aldridge Pite, LLP. My business address is: Fifteen Piedmont Center 3575 Piedmont Road, N.E. Suite 500 Atlanta, GA 30305. I am over the age of eighteen years and not a party to this case.

On October 3, 2017, I caused the Request for Special Notice and Service of Copies to be served in said case by electronic means through the court's CM/ECF system or through United States Mail, from Atlanta, GA, addressed as follows: SEE ATTACHED SERVICE LIST.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2017

/s/ Michael L. Tidwell
MICHAEL L. TIDWELL

SERVICE LIST

DEBTOR(S) (VIA U.S. MAIL)

Residential Capital, LLC 1177 Avenue of the Americas New York, NY 10036

<u>DEBTOR(S) ATTORNEY</u> (VIA ELECTRONIC NOTICE)

Donald H. Cram Severson & Werson, PC One Embarcadero Center Suite 2600 San Francisco, CA 94111 dcram@severson.com

UNITED STATES TRUSTEE

United States Trustee Office of the United States Trustee U.S. Federal Office Building 201 Varick Street, Room 1006 New York, NY 10014